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UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NEW YORK

Hearing Date: July 21, 2020
Hearing Time: 11:30 a.m.
Objection Deadline: July 14, 2020

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In re:

QUIMERA RESTAURANT GROUP LLC,

Case No.: 18-41986-cec
Chapter 7

Debtor.

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DAVID J. DOYAGA, SR., AS TRUSTEE OF
THE QUIMERA RESTAURANT GROUP LLC

Plaintiff,

Adv. Pro. No.: 20-01040-cec

-against-

DEUTSCHE BANK TRUST CO.
AMERICAS,

Defendant.

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**NOTICE OF PLAINTIFF'S APPLICATION FOR ENTRY OF JUDGMENT
UPON DEFAULT PURSUANT TO RULE 55 OF FEDERAL RULES OF CIVIL
PROCEDURE AND RULE 7055 OF RULES OF BANKRUPTCY PROCEDURE**

PLEASE TAKE NOTICE that David J. Doyaga Sr., the chapter 7 trustee and plaintiff herein (the "Trustee" and/or "Plaintiff"), by and through his attorneys, Rosen & Kantrow, PLLC, shall move before the Honorable Carla E. Craig, United States Bankruptcy Judge, on **July 21, 2020 at 11:30 a.m.**, or as soon thereafter as counsel may be heard, for the entry of an Order, substantially in the form of the proposed Order annexed hereto, granting judgment upon default against defendant Deutsche Bank Trust Co., Americas, (the "Defendant") pursuant to Rule 55 of the Federal Rules of Civil Procedure made applicable herein pursuant to Rule 7055 of the Federal Rules of Bankruptcy

Procedure (the “Bankruptcy Rules”), at the United States Bankruptcy Court, 271-C Cadman Plaza East, Suite 1595, Brooklyn, New York 11201 in Courtroom 3529.

PLEASE TAKE FURTHER NOTICE that objections, if any, to the relief sought in the application must conform to the Bankruptcy Rules and the Local Rules of the Bankruptcy Court, as modified by any administrative orders entered in this case, and be filed with the Bankruptcy Court electronically in accordance with the Administrative Orders of this Court, by registered users of the Bankruptcy Court’s case filing system and, by all other parties in interest, on a 3.5 inch disk, preferably in Portable Document Format (PDF), WordPerfect, Microsoft Word, DOS text (ASCII) or a scanned image of the filing, with a hard copy delivered directly to Chambers, and be served in accordance with the Administrative Orders of this Court; and upon (i) counsel to the Plaintiff, Rosen & Kantrow, PLLC, Attn: Avrum J. Rosen, Esq., 38 New Street, Huntington, New York 11743 and (ii) the Office of the United States Trustee, 201 Varick Street, Suite 1006, New York, New York 10014, so as to be received by no later than **4:00 p.m. (prevailing Eastern Time) on July 7, 2020.**

PLEASE TAKE FURTHER NOTICE that only those objections that have been timely filed may be considered by the Court.

Dated: Huntington, New York
June 25, 2020

Respectfully submitted,

Rosen & Kantrow, PLLC
Attorneys for David J. Doyaga, Sr.

BY: /s/ Avrum J. Rosen
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